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March 16, 2020

VIA ECF

The Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *State Farm Mut. Auto. Ins. Co., et al. v. 21st Century Pharmacy, Inc., et al.*,
17 Civ. 5845-MKB-VMS – Joint Request for Extension of Stay of Proceedings**

Dear Judge Scanlon:

Pursuant to the Court's February 27, 2020 Text Orders, the Parties to the above-referenced action write jointly to update the Court on the status of mediation and to respectfully request an extension of the stay of proceedings until May 5, 2020.¹

The Parties are diligently working toward mediation. They have selected and agreed upon a mediator and scheduled a mediation through JAMS for April 28, 2020. The mediation will go forward ideally in person if circumstances allow, or by remote means if the present public health crisis continues.

Given the date set for the mediation, travel restrictions, necessary social distancing and related office closures, an extension of the stay of proceedings ordered by this Court on February 27, 2020 is appropriate and warranted. Even absent mediation, an extension of the stay would be appropriate due to challenges the public health crisis presents to document discovery and conducting depositions.

By this letter, the Parties respectfully request that the Court continue the stay through May 5, 2020, which will provide the Parties with time to complete mediation and attempt to resolve

¹ The "Parties" to this action include Defendants 21st Century Pharmacy Inc., Albert Alishayev, Iris Itskhakov a/k/a Istam Itskhakov, Peter Khaim a/k/a Peter Khaimov a/k/a Petr Khaimov, Tariel Begiyev, Express Billing & Collection Inc, Anturio Marketing, Inc., Logic Consulting, Inc., P&K Marketing Services Inc, A&P Holding Group Corp, New Business Resources Group Inc, K&L Consultants Inc, New Business Funding Inc, TBM Solution Inc, TAR Group Inc, Azu A. Ajudua, M.D., and Vincentiu Popa, M.D. (together, "Defendants") and Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (together, "Plaintiffs") (collectively, Plaintiffs and Defendants are referred to as the "Parties"). Defendants Timothy Morley, M.D., Jo-Ann Shakarjian, M.D., and Personal Tech Inc have not answered the First Amended Complaint, and Certificates of Default have been entered against them. Dkts. 185–87.



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their disputes. The Parties further request that the Court extend any deadlines set forth in Text Orders entered on February 27, 2020 by the length of any continuation of the stay.

Respectfully Submitted By:

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